

Sep 22, 2022

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
22-20456-CR-MOORE/LOUIS
Case No. _____

18 U.S.C. § 1349

18 U.S.C. § 1341

18 U.S.C. § 2

18 U.S.C. § 981(a)(1)(C)

UNITED STATES OF AMERICA

vs.

REINALDO MIRALLES GONZALEZ,

Defendant.

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. Defendant **REINALDO MIRALLES GONZALEZ** was a resident of Miami-Dade County, Florida.
2. **REINALDO MIRALLES GONZALEZ** was the president and registered agent of the Florida corporation, Centro De Rehabilitacion Nueva Vida Corp., which was located at 1140 West 50th Street, Suite 400B, Hialeah, Florida.
3. **REINALDO MIRALLES GONZALEZ** maintained accounts at Citibank, N.A., J.P. Morgan Chase Bank, T.D. Bank and Bank of America.

Victims

4. L.T. was a resident of the State of California.
5. K.S. was a resident of the State of Ohio.
6. C.S. was a resident of the State of Ohio.
7. T.M. was a resident of the State Colorado.
8. J.P. was a resident of the State of New York.
9. D.M. was a resident of Lebanon, Tennessee.
10. B.F. was a resident of Washington, Montana.

COUNT 1
Conspiracy to Commit Mail Fraud
(18 U.S.C. § 1349)

1. The General Allegations Section of this Indictment is realleged and incorporated by reference as though fully set forth herein.

2. From in or around March 2017, through in or around December 2021, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

REINALDO MIRALLES GONZALEZ,

did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury, to knowingly, and with intent to defraud, devise and intend to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that such pretenses, representations, and promises were false and fraudulent when made, and, for the purpose of executing and attempting to execute the

scheme and artifice, did knowingly cause to be delivered certain mail matter by a private and commercial interstate carrier according to the directions thereon, in violation of Title 18, United States Code, Section 1341.

PURPOSE OF THE CONSPIRACY

3. It was the purpose of the conspiracy for the defendant and his co-conspirators to unjustly enrich themselves by defrauding elderly victims, and others, by fraudulently posing as law enforcement personnel, judges, and lawyers, among others, and falsely threatening the victims with arrest or other legal consequences if they failed to send money to the defendant and his co-conspirators.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendant and his coconspirators sought to accomplish the purpose of the conspiracy included, among other thing, the following:

4. Between in or around March 2017 and in or around December 2021, **REINALDO MIRALLES GONZALEZ** and his co-conspirators contacted, or caused to be contacted, victims and falsely represented themselves to be agents with the Federal Bureau of Investigation, or other law enforcement. **GONZALEZ** and his co-conspirators fraudulently posed as actual agents who were assigned to the Miami Field Office of the Federal Bureau of Investigation. During these calls, **GONZALEZ** and/or his co-conspirators falsely told victims, including L.T., K.S., C.S., T.M., J.P., D.M. and B.F., that the victims were the subjects of investigation for purportedly sending funds to terrorists or to support terrorist activities.

5. **REINALDO MIRALLES GONZALEZ** and/or his co-conspirators falsely told victims that they were in danger of imminent arrest, as a result of the purported terrorism investigation, and that in order to avoid arrest and other legal consequences, the victims had to

make immediate payments, using blank United States Postal money orders and sent via Federal Express to addresses provided by the callers. These addresses included **REINALDO MIRALLES GONZALEZ's** home address as well as the address of his business, Centro De Rehabilitacion Nueva Vida Corp.

6. Upon receipt of the United States Postal money orders which were sent to his home address or Centro De Rehabilitacion Nueva Vida Corp.'s address, **REINALDO MIRALLES GONZALEZ** deposited those money orders into corporate and personal bank accounts which he controlled at Citibank, N.A., J.P. Morgan Chase Bank, T.D. Bank and Bank of America and used the funds for his personal use, the use and benefit of others and to further the conspiracy.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-5
MAIL FRAUD
(18 U.S.C. §1341)

1. The General Allegations section of this Indictment is re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around March 2017, through in or around December 2021, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

REINALDO MIRALLES GONZALEZ,

did knowingly and with intent to defraud, devise and intend to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and did knowingly cause to be delivered certain mail matter by private and commercial interstate carrier according to the directions thereon.

PURPOSE OF THE SCHEME AND ARTIFICE

3. It was the purpose of the scheme and artifice for the defendant and his accomplices to unjustly enrich themselves by defrauding elderly victims, and others, by fraudulently posing as law enforcement personnel, judges, and lawyers, among others, and falsely threatening the victims with arrest or other legal consequences if they failed to send money to the defendant and his accomplices.

THE MANNER AND MEANS OF THE SCHEME AND ARTIFICE

4. The Manner and Means section of Count 1 of this Indictment is re-alleged and incorporated by reference herein as a description of the manner and means by which the defendant and his accomplices sought to accomplish the scheme and artifice.

USE OF THE MAILS

On or about the dates specified as to each count below, the defendant, for the purpose of executing and in furtherance of the scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, did knowingly cause to be delivered, by private and commercial carrier, according to the directions thereon, the items identified below in each count:

| COUNT | APPROXIMATE DATE | DESCRIPTION OF MAILING |
|-------|--------------------|--|
| 2 | September 29, 2017 | Ten (10) United States Postal money orders each in the amount of \$1,000, mailed from Corona, New York to Hialeah, Florida, in the Southern District of Florida |
| 3 | October 30, 2017 | Seven (7) United States Postal money orders each in the amount of \$1,000, mailed from Aurora, Colorado to Hialeah, Florida, in the Southern District of Florida |

| COUNT | APPROXIMATE DATE | DESCRIPTION OF MAILING |
|-------|--------------------|---|
| 4 | September 23, 2021 | Five (5) United States Postal money orders each in the amount of \$1,000, and two (2) United States money orders each in the amount of \$500, mailed from Lebanon, Tennessee to Miami, Florida, in the Southern District of Florida |
| 5 | December 15, 2021 | Four (4) United States Postal money orders each in the amount of \$1,000, and one (1) United States money order in the amount of \$500 mailed from Washington, Montana to Miami, Florida, in the Southern District of Florida |

In violation of Title 18, United States Code, Sections 1341 and 2.

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **REINALDO MIRALLES GONZALEZ**, has an interest.

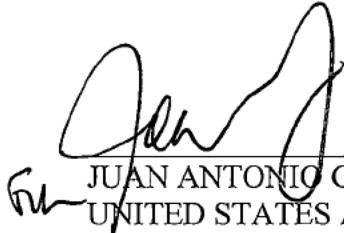
2. Upon conviction of a violation of, or a conspiracy to violate, Title 18, United States Code, Section 1341, as alleged in this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), any property, real or personal, which constitutes or is derived from proceeds traceable to such violation.

3. The property subject to forfeiture includes, but is not limited to, the following: Approximately \$123,898 (US), which is a sum of money equal in value to the property constituting or derived from proceeds traceable to the violations alleged in this Indictment, which the United States of America will seek as a forfeiture money judgment against the defendant as part of sentence.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and the procedures set forth at Title 21, United States Code, Section 853, which are made applicable by Title 18, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON


JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY


LOIS FOSTER-STEERS
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.:

v.

REINALDO MIRALLES GONZALEZ,

CERTIFICATE OF TRIAL ATTORNEY*

Superseding Case Information:

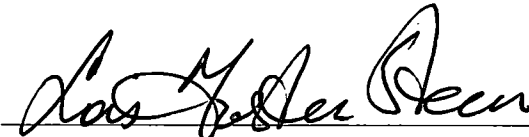
Defendant.
Court Division (select one)
☒ Miami ☐ Key West ☐ FTP
☐ FTL ☐ WPB

New Defendant(s) (Yes or No)
Number of New Defendants
Total number of New Counts

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) Yes
List language and/or dialect: Spanish
4. This case will take 10 days for the parties to try.
5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)
I ☐ 0 to 5 days ☐ Petty
II ☒ 6 to 10 days ☐ Minor
III ☐ 11 to 20 days ☐ Misdemeanor
IV ☐ 21 to 60 days ☒ Felony
V ☐ 61 days and over
6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
7. Has a complaint been filed in this matter? (Yes or No) No
If yes, Magistrate Case No. _____
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of _____
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No

By:



Lois Foster-Steers
Assistant United States Attorney
FLA Bar No. 480509

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: REINALDO MIRALLES GONZALEZ

Case No: _____

Count #: 1

Conspiracy to Commit Mail Fraud

Title 18, United States Code, Section 1349

- * **Max. Term of Imprisonment:** Twenty (20) years' imprisonment
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 Years
- * **Max. Fine:** \$250,000, or not more than the greater of twice the gross gain or twice the gross loss derived from the offense

Counts #: 2-5

Mail Fraud

Title 18, United States Code, Section 1341

- * **Max. Term of Imprisonment:** Twenty (20) years' imprisonment
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 Years
- * **Max. Fine:** \$250,000, or not more than the greater of twice the gross gain or twice the gross loss derived from the offense